Summary of EPA meeting with AgLoic, November 10, 2020

Attendees:

AgLogic: Larry Hodges, Antoine Puech, Dick Heinzelman, Amy Ritter (Waterborne Environmental), Beth Mileson (TSG Consulting), Ann Tillman (Pyxis Regulatory Consulting)

EPA: D. Rate, M. Johnson, S. Adeeb, M. Metzger, D. Gardner, R. Waterworth, W. Donovan,H. Johnson, J. Bozniak, M. Suarez, S. Santiago, J. Henzel, J. Becher, L. Hendrich

BEAD provided this information prior to the call

Oranges (fresh): 15% domestic; 3% import (18%)
Orange (juice): 75% domestic; 15% import (90%)
Grapefruit (fresh)
Grapefruit (juice)

The data was compiled by BEAD and obtained use information from a market leader insecticide which targets the same pests as does aldicarb but BEAD would not identify the insecticide.

BEAD assumed 100% of imported crops are treated because they have no data for usage outside of the US. AgLogic commented that this PCT is unrealistic since there are no registrations or use of aldicarb outside of the US. EPA commented that they would discuss what additional information would be needed to document no uses outside of the US.

BEAD uses the 2019 NASS data on citrus. E

The risk cup is affected mostly by the PCT. AgLogic believes EPA's assumptions of treated acres are unrealistic. BEAD appears to accept AgLogic's proposal to cap the treated acres to 100,000 on orange and grapefruit. BEAD should be using column **C** (total US acres) and the percent crop treated as calculated in column **O** in the table below. If the entire 100,000 acre allotment were for treatment of juice oranges, then the percent crop treated would be about 26.1% of the US orange juice acres and **IF** EPA considered all US orange and grapefruit acres, then the percent crop treated would be about 17.9%.

Site	EPA US Orange and Grapefruit Acres (Column C)	US Acres that Could be Treated if 100,000 Acre Cap on Use (Column O)
Fresh oranges	126,924	78.8%
Fresh grapefruit	24,128	414.5%
Fresh Total	**151,052**	**66.2%**
Juice oranges	382,976	26.1%
Juice grapefruit	25,572	391.1%
Juice Total	**408,548**	**24.5%**
Fresh and Juice Total	**559,600**	**17.9%**

EPA was not able to comment on the inputs into DEEM (0.003 in PDP vs 0.005 in EPA DEEM) except that there must be variability in the LODs from lab to lab. Beth was going to check the inputs values. EPA did not think that the differences would impact the overall risk.

The risk assessment is highly refined and the PCT is the driver. EPA suggested AgLogic conduct their own dietary risk assessment to see if removal of other crops affects the dietary risk, but orange juice appears to be the major contributor to the risk cup.

EPA is not considering the benefits of the use of aldicarb at this time because the Agency cannot make a safety determination due to the risk cup issue. As a result, a decision is likely not going to be made with the current Agency limitations and time resources.

EPA would discuss internally if the PCT slides could be shared with AgLogic.